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MEMO ENDORSED

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October 18, 2021

10/19/21

Hon. Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

*Trial Adjourned to the
1st quarter 2022 - time
exclude (w/def's consent)
through the new trial date,
in the interest of
justice, to facilitate the
review of discovery and
plea discussions.*

Re: United States v. Jorge Espino Hernandez, 20 Cr. 659 (CM)

Dear Judge McMahon:

I am counsel for Mr. Espino Hernandez, and Frederick Sosinsky and Virginia Alvarez are counsel for Pablo Valtierra Mata. Without objection from the Government, we respectfully request an adjournment of the trial currently scheduled for December 13, 2021.

Additional time is necessary in order to permit the parties to review discovery and negotiate pretrial dispositions. The parties expect a disposition without trial.

The parties respectfully request that time be excluded from December 13, 2021, until any new trial date in the first quarter of 2022 under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), to permit the parties to continue discussing a potential pretrial disposition of the case and allow the defense additional time to review discovery materials.

Sincerely,

/s/

Donald J. Yannella, Esq.

